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Attorneys for Plaintiff  
TAYLOR THOMSON

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Taylor Thomson

Plaintiff,

v.

Persistence Technologies BVI Pte Ltd., Tushar  
Aggarwal, Ashley Richardson,

Defendants.

Case No. 2:23-cv-04669-MEMF-MAR

**PLAINTIFF TAYLOR THOMSON'S  
NOTICE OF MOTION AND MOTION TO  
DISMISS DEFENDANT ASHLEY  
RICHARDSON'S AMENDED  
COUNTERCLAIMS**

The Honorable Maame Ewusi-Mensah  
Frimpong, United States District Judge

Date: May 30, 2024

Time: 10:00 a.m.

Courtroom: 8B

1 NOTICE IS HEREBY GIVEN that on May 30, 2024, at 10:00 a.m., or as soon thereafter as  
2 the Court is available, before the Honorable Maame Ewusi-Mensah Frimpong, in Courtroom 8B of  
3 the United States District Court, Central District of California, located at 350 West First Street, 8<sup>th</sup>  
4 Floor, Los Angeles, California 90012, Plaintiff Taylor Thomson (“Plaintiff”) will and hereby does  
5 move the Court pursuant to Federal Rules of Civil Procedure 8(a) and 12(b)(6), to dismiss Defendant  
6 Ashley Richardson’s (“Defendant”) Amended Counterclaims.

7 This Motion is based on this Notice of Motion, the accompanying Memorandum of Points  
8 and Authorities, the pleadings, records, and files in this action, any reply memoranda or additional  
9 briefing on this subject, the attached proposed order, and on such further oral and written matters as  
10 the Plaintiff may present at or before the hearing on this matter.

11 For the reasons stated above and set forth in the accompanying Memorandum of Points and  
12 Authorities, Plaintiff respectfully requests that the Court dismiss the Defendant’s amended  
13 counterclaims in their entirety with prejudice.

14 This Motion is made following the conference of counsel of Plaintiff and the Defendant,  
15 which occurred via videoconference on February 14, 2024. Counsel for Plaintiff attempted to contact  
16 Defendant on February 9, 2024, but did not receive a response until some days later.

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18  
19 Dated: February 16, 2024

**MCDERMOTT WILL & EMERY LLP**

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21 By: /s/ Julian L. André  
JULIAN L. ANDRE

22 Attorneys for Plaintiff  
23 TAYLOR THOMSON  
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**PROOF OF SERVICE**

I am a citizen of the United States and resident of the State of California. I am employed in Los Angeles, California. My business address is McDermott Will & Emery, LLP, 2049 Century Park East, Suite 3200, Los Angeles, CA 90067. I am over the age of eighteen years and not a party to this action.

On February 16, 2024, I served unredacted copies of the following document:

**PLAINTIFF TAYLOR THOMSON'S NOTICE OF MOTION AND MOTION TO DISMISS  
DEFENDANT ASHLEY RICHARDSON'S AMENDED COUNTERCLAIMS**

on the following party via Electronic Mail based on the written consent of Ms. Richardson:

Ashley Richardson  
25399 Markham Lane  
Salinas, CA 93908  
ashrichardson@mac.com

*Defendant in Pro Per*

on the following parties via the CM/ECF Notice system:

AnnaMarie A. Van Hoesen  
AVanHoesen@jenner.com  
515 Flower Street, Suite 3300  
Los Angeles, CA 90071

*Counsel for Defendants Persistence  
Technologies (BVI) PTE. Ltd. and  
Tushar Aggarwal*

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on February 16, 2024 in Los Angeles, California.

/s/ Diksha Vadan  
Diksha Vadan